

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

MOLDEX-METRIC, INC.,

Plaintiff,

v.

3M COMPANY and 3M INNOVATIVE
PROPERTIES COMPANY,

Defendants.

Civil No. 14-cv-01821 (JNE/LFN)

**DECLARATION OF
KATHERINE A. MOERKE
IN SUPPORT OF MOLDEX'S
MOTION TO AMEND ITS
COMPLAINT**

I, Katherine A. Moerke, declare as follows:

1. I am an attorney admitted to practice in the District of Minnesota and am one of the attorneys representing Plaintiff Moldex-Metric, Inc., in this matter.
2. Attached as Exhibit 1 is a true and correct copy of the Memorandum in Support of Moldex's Motion for Summary Judgment of Non-Infringement of U.S. Patent No. 6,070,693 in 3M's prior patent lawsuit against Moldex (12-cv-00611) ("3M's Patent Lawsuit"), dated January 18, 2013. This Memorandum was filed under seal in 3M's Patent Lawsuit, and the placeholder is at Docket No. 35 in that matter. This Memorandum was also of record and before the Court when it issued its February 9, 2015, Order, denying 3M's Motion to Dismiss. (FILED UNDER SEAL)

3. Attached as Exhibit 2 a true and correct copy of Exhibit D to the Declaration of Kevin D. Conneely in Support of Moldex's Motion for Summary Judgment previously filed as Docket No. 36-4 in 3M's Patent Lawsuit.

4. Attached as Exhibit 3 is a true and correct copy of Exhibit R to the Declaration of Kevin D. Conneely in Support of Moldex's Motion for Summary Judgment previously filed as Docket No. 36-16 in 3M's Patent Lawsuit.

Dated: November 16, 2015

By: s/Katherine A. Moerke
Katherine A. Moerke